

FR Doc # 04-7984
PUBLIC COMMENT 8400060

From: "Lynn Soffer" <LSoffer@chsmedical.com>
To: <wvogl@samhsa.gov>
Date: 7/6/04 12:02PM
Subject: Comments on FR Doc. 04-7984

Dr. Vogl,

I have been a practicing MRO since 1995, and supervise a staff of certified MROs at Comprehensive Health Services, Inc. which is a third party administrator for both regulated and non-regulated drug testing programs. In the regulated drug testing arena, I have experience reviewing tests falling under both the Department of Transportation (DOT) and the Department of Health and Human Services (HHS) regulations, and have been involved with MRO review of over 200,000 drugs screens performed for the Transportation Security Administration.

I am writing to recommend that HHS withdraw its Proposed Revisions to Mandatory Guidelines for Federal Workplace Drug Testing Programs, until details regarding alternative testing and result interpretation are thoroughly worked out. Fairness and consistency are crucial for the successful implementation of any changes in federal drug testing programs. I am in complete agreement with the comments submitted on June 29, 2004 by Mr. Kenneth C. Edgell.

Respectfully submitted,

Lynn J. Soffer, M.D. M.S.
Associate Medical Director
Comprehensive Health Services, Inc.
8229 Boone Blvd. Suite 700
Vienna, VA 22182